

BARBARA ANN THURMAN (BLEVINS),	*	IN THE UNITED STATES
	*	
PLAINTIFF,	*	DISTRICT COURT FOR THE
	*	
VS.	*	MIDDLE DISTRICT OF
	*	
PROGRESSIVE INSURANCE COMPANY,	*	ALABAMA
	*	
DEFENDANT.	*	SOUTHERN DIVISION
	*	
	*	CASE NO.: 1:06-cv-398

**MOTION TO CONTINUE AND EXTEND DEADLINES ON THE UNIFORM
SCHEDULING ORDER**

COMES NOW, the Plaintiff, BARBARA ANN THURMAN (BLEVINS), in the above styled cause, by and through her undersigned attorney and moves this Honorable Court to continue the trial in this matter and for extension of times on the Uniformed Scheduling Order and as grounds therefore states:

1. Since the telephone conference with the court and counsel for the Defendant, the Plaintiff has tried diligently to set depositions up with the medical care providers and has been unable to and it appears that he will be unable to take the depositions of the medical care providers for the Plaintiff until after the holidays.
2. The undersigned attorney has contacted the attorney for the Defendant and the attorney for the Defendant has no objections to the Motion to Continue or the extension of deadlines.

WHEREFORE, PREMISE CONSIDERED, the Plaintiff would pray this Honorable Court to extend the completion of discovery from November 29, 2006 until February 28, 2007, that section eight deadlines be extended until February 15, 2007 for the Plaintiff and February 28,

2007 for the Defendant.

Respectfully submitted this the 21st day of November, 2006.

/s/ W. Terry Bullard
W. TERRY BULLARD (BUL007)
Attorney for the Plaintiff
Post Office Box 398
Dothan, Alabama 36302
(334) 793-5665

CERTIFICATE OF SERVICE

I, W. Terry Bullard, hereby certify that I have this date mailed a copy of the foregoing Motion to the Honorable R. Larry Bradford, Attorney for the Defendant, 2020 Canyon Road, Suite 100, Birmingham, Alabama 35216, by electronically filing the same on this the 21st day of November, 2006.

/s/ W. Terry Bullard
OF COUNSEL